

A nonprofit organization formed to conduct public forums at which lectures and debates on social, political, and international matters are presented qualifies for exemption from Federal income tax under section 501(c)(3) of the Internal Revenue Code of 1954, even though some of its programs include controversial speakers or subjects.

I.T. 1224, C.B. I-I, 256 (1922), superseded.

Advice has been requested whether an organization formed to conduct public forums at which lectures and debates are presented for the benefit of the community is exempt from Federal income tax under section 501(c)(3) of the Internal Revenue Code of 1954.

The organization was formed for exclusively charitable and educational purposes. Its primary purpose is to bring about a fair and openminded consideration of social, political, and international questions by the promotion and sponsorship of a public forum at which debates and lectures are conducted. Its charter specifically states (1) the organization shall have no institutional point of view and is not responsible for the views expressed by the speakers, and (2) its only responsibility is to bring the views expressed to the attention of the community. The charter further provides that no substantial part of its activities shall be carrying on propaganda, or otherwise attempting, to influence legislation, and that it shall not participate in or intervene in any political campaign of a candidate for public office. In the event of dissolution, its assets are to be paid over to the local school board for scholarship purposes.

In carrying out its primary purpose, the organization invites prominent individuals to discuss varying political and social matters of national and community interest. The speakers, in addition to delivering their prepared text, answer questions of those attending. The other part of the organization's program involves the sponsorship of debates. Individuals representing opposing viewpoints are invited to debate particular topics. The debates are conducted in accordance with carefully drawn rules. Frequently, the persons invited to lecture or debate are controversial and occasionally there is opposition to their appearance. None of the programs or activities of the organization involves in any way participation or intervention in any political campaigns of candidates for public office. Discussions which involve participation or intervention in campaigns are not permitted.

The organization rents a hall for its programs and distributes promotional literature calling the public's attention to the events. Financial support comes from charges for admission to the forums and from contributions.

Section 501(c)(3) of the Code provides for the exemption of organizations formed and operated exclusively for charitable and educational purposes.

The presentation of public lectures, forums, or debates is a recognized method of educating the public. See section 1.501(c)(3)-1(d)(3) of the Income Tax Regulations. The fact that the presence of the invited speaker or his opinions may precipitate controversy within the community does not adversely affect the status of an organization whose primary purpose is to provide a forum for speakers independent of the organization.

Accordingly, the organization qualifies for exemption under section 501(c)(3) of the Code.

I.T. 1224, C.B. I-I, 256 (1922), holding that an organization organized and operated to bring about a fair and open-minded consideration of social, political, and international questions in college students qualified for exemption under a predecessor statute of section 501(c)(3) of the Code, is superseded.

An organization which considers itself within the scope of this Revenue Ruling must, in order to establish exemption under section 501(c)(3) of the Code, file an application on Form 1023, Exemption Application, with the District Director of Internal Revenue for the internal revenue district in which is located the principal place of business or principal office of the organization. See section 1.501(a)-1 of the regulations.